

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,) Criminal No. 18-251 (DWF/KMM)
)
v.) Plaintiff,)
) **MOTION TO CONTINUE TRIAL**
CHASE MACAULEY) **AND EXCLUDE TIME UNDER THE**
ALEXANDER,) **SPEEDY TRIAL ACT**
)
 Defendant.

Chase Macauley Alexander, through counsel, moves this Court for a trial continuance in the above-captioned matter. On December 17, 2018, counsel for Mr. Alexander filed pretrial motions for a motions hearing scheduled in January. Prior to the motions hearing, counsel contacted the Court to schedule a change of plea for Mr. Alexander and the hearing was set for February 14, 2019. Prior to the change of plea, Mr. Alexander began to have doubts about his chosen course of action and counsel contacted the Court to cancel the February 14, 2019 hearing. While the parties are still communicating and working toward a resolution, Mr. Alexander respectfully requests a 60-day continuance to work with counsel. The government has no objection to this request.

Pursuant to this motion, Mr. Alexander moves to exclude a 60-day period of time from the Speedy Trial Act computations in this case, pursuant to 18 U.S.C. § 3161(h)(7)(A). The grounds for this motion will be set forth in the impending Statement of Facts in Support of Exclusion of Time Under Speedy Trial Act. A proposed order accompanies this motion.

Dated: March 18, 2019

Respectfully submitted,

s/Shannon Elkins

SHANNON ELKINS
Attorney No. 332161
Attorney for Defendant
Office of the Federal Defender
107 U.S. Courthouse
300 South Fourth Street
Minneapolis, MN 55415